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## CALHOUN COMMUNITY UNIT DISTRICT 40

Hardin, Illinois 62047  
*"Home of the Warriors"*

Chairman Ajit Pai  
Federal Communications Commission  
445 12th Street SW,  
Washington, DC 20554  
July 26, 2019

Dear Chairman Pai,

I am writing today in response to the Federal Communications Commission's (FCC) Public Notice which, among other things, considers changes to the Universal Service Fund (USF) programs, including E-Rate. Before delving into my response to the proposed changes, I want to thank the FCC for its continued support for the E-Rate program and for the critical programmatic and policy changes the commission adopted in 2014. The E-Rate program provides critical discounts to assist schools (like mine) to obtain affordable telecommunications and internet access.

I am the superintendent for a small rural school district in west central Illinois. We have approximately 450 total enrollment for K-12<sup>th</sup> grades. We have 46% poverty rate, which has been trending upwards since at least 2008. We rely heavily upon the support of E-Rate each and every year. It helps Calhoun CUSD#40 sustain part of its technology infrastructure district-wide. By utilizing E-Rate we can free up other monies to help pay for curriculums that we cannot otherwise afford to purchase. We have been hit extremely hard by the State of Illinois proration since I became superintendent in 2012 to a tune of approximately \$1.3 million lost. This has been a devastating hit to this small rural school district with a small property and sales tax base. There is little money to purchase anything else including textbooks and online curriculums. The District is recently experiencing a teacher shortage, as the surrounding school districts are able to pay salaries at a higher rate mainly due to their property tax base. That is not the case in Calhoun County. Therefore, every dollar counts here at Calhoun CUSD #40.

The E-Rate program, and the broader USF program, is a program succeeding in its mission. As the FCC moves forward with this public notice, it is prudent to remain focused on the fact that E-Rate is a program that works. Any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential and ensuring the FCC remains a good steward of the changes adopted 2014, allowing those changes to progress and play out as intended. Changes to the E-Rate program and the broader USF program must be focused on bolstering and strengthening the original intent of the underlying programmatic

statute, expanding equitable access to connectivity in multiple areas, through all four USF programs (E-Rate, Rural Health Care, Lifeline, and Connect America Fund).

The organizing theme of the proposed rule is a focus on a funding cap for the USF program, including pairing E-Rate under a funding cap with Rural Health Care. E-Rate played a critical role is the rapid and significant expansion of connectivity in schools, and I am concerned that the proposed rule will unnecessarily pit two important priorities—connectivity in schools with rural health care—against each other, resulting in an arbitrary funding pressure that not only disregards and dismisses the original intent of the statute creating all four USF programs, but also stands to undermine and threaten the great progress of E-Rate.

I am opposed to the rule as drafted. The proposed rule conflicts with the original legislative intent of the underlying 1996 Telecommunications Act, which was explicit in its creation of two separate and distinct programs for schools/libraries and rural health care providers. The proposed rule unnecessarily pits schools/libraries against rural hospitals/clinics, creating a false race to the bottom under which both programs and the communities they support lose. The proposed rule will likely immobilize E-Rate funding and expand confusion among beneficiaries. Specific to E-Rate and schools, where school system leaders have a responsibility to balance their budget annually, the idea that the E-Rate funding would be hamstrung and lack certainty in availability will certainly impact how districts plan to continue (or discontinue, should funding not be certain or reliable) their effort to build out connectivity to meet the learning needs of their students.

The goal of the E-Rate program is simple: equitable access to affordable connectivity. While the overwhelming majority of schools and libraries are connected, the ongoing conversation about connectivity and E-Rate must continue to support and protect the shift from establishing connectivity to ensuring adequate connectivity (specifically, access to high-speed broadband). A massive overhaul of the E-Rate program without considering its initial purpose—one that has yet to be fully recognized—is poor policy. The FCC must support continuation of an E-Rate program that remains focused on expanding the E-Rate program from simple connectivity to expanded connectivity.

Being a small rural school district, Calhoun CUSD #40 is unique in the aspect that it has endured several hardships that may not be experienced by those who live in suburban or urban areas. Calhoun County only has one provider for Internet services. The service has intermittent service most of the time, which is very unreliable—especially for the school district and any person who has the capability of working from home. Most of those folks have had to purchase satellite internet services that are costly due to the fact the usage is tied to a data package. Although our county is comprised of beautiful rolling hills, its topography is not conducive to Wi-Fi or cell phone signals. There are many areas including Calhoun Elementary School that cell service is not available at all.

As mentioned before, Calhoun CUSD #40 utilizes E-Rate mainly to help support its technology infrastructure. For example, this upcoming year, the schools are in need of new wireless access points for the Wi-Fi to support students' devices they use in the classrooms. The District is also in need of various switches that support the equipment throughout the district. The current switches are slowly dying and must be replaced when they go down—therefore, not interrupting service for the staff and students. The District has been able to capitalize on the Category 2

funding for many years. Thus having the ability to help sustain the district's technology infrastructure.

The District currently wrote for a Category 1 project to bring fiber to the District. If that were to happen then high-speed internet would be an option for the community too. The carrier would run the fiber line from the school and expand it for citizens of Calhoun County. This would be an absolute game changer for Calhoun County. I have a meeting scheduled with Representative Rodney Davis who has invited a group of stakeholders to discuss broadband services to rural areas, on August 6, 2019. Rep. Davis will discuss the lack of accessibility of broadband services in rural areas and share possibilities of how this issue can be resolved. I cannot impress upon you enough the importance of the E-Rate program is for Calhoun CUSD #40.

In closing, I'd like to reiterate the district's continued, strong support for and reliance upon the E-Rate program for being able to utilize it to help support the technology infrastructure at Calhoun CUSD #40. It is essential to our students' learning. Thank you for considering these comments.

Sincerely,



Dr. Kate Sievers  
Superintendent